

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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LUIS INCLAN, IVAN KRAUCHANKA,  
SZILVIA REP, MAME FATOU WADE, and  
SKANDER SOLTANI,  
*on behalf of themselves, FLSA Collective Plaintiffs  
and the Class,*

Case No.: 12-cv-4498(NRB)(FM)

Plaintiffs,

v.

NEW YORK HOSPITALITY GROUP, INC.,  
RAJMAR HOLDINGS INC. and  
RAJU S. MIRCHANDANI,

Defendants.

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**DECLARATION OF C.K. LEE**

I, C.K. Lee, under penalty of perjury, affirm as follows:

1. My name is C.K. Lee, and I am a partner at Lee Litigation Group, PLLC, Plaintiffs' counsel in the above-captioned matter.

2. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 1 is a true and correct copy of the Deposition Transcript of Mr. Raju Mirchandani dated July 26, 2013.

3. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 2 is a true and correct copy of the Deposition Transcript of Ms. Aisa Kasim dated August 19, 2013.

4. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 3 is a true and correct copy of the Deposition Transcript of Ms. Adriana Daci dated August 19, 2013.

5. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 4 are true and correct copies of Defendants' document production, Bates Nos. D009097-9099.

6. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 5 are true and correct copies of Defendants' production of documents, Bates Nos. D004178, 4180-83.

7. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 6 is a true and correct copy of Judge Francis' Report and Recommendation, *Reyes v. Sofia Fabulous Pizza Corp.*, 13 Civ. 7549, Dkt. No. 37, Slip Op. (S.D.N.Y. Apr. 7, 2014), *report and rec'n adopted*, Dkt. No. 44 (S.D.N.Y. Apr. 24, 2014).

8. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 7 are true and correct copies of Plaintiffs' production of documents, Bates Nos. P392, 401, 430, 447, 481, 493, 496, 505, 533, 534, 535-539, 546-551, 621-623, 625-633.

9. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 8 are true and correct copies of Defendants' production of documents, Bates Nos. D010507-10508, 2018-2022 and 2056-2057.

10. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 9 are true and correct copies of Defendants' production of documents, Bates Nos. D010527-10530, 166-167, and 2006-2007.

11. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 10 are true and correct copies of Defendants' production of documents, Bates Nos. D002008-D002012, and 2228.

12. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 11 are true and correct copies of Defendants' production of documents, Bates Nos. D010068-10069, 2040, 10603-10605, 9197-9201 and 2224.

13. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 12 are true and correct copies of Defendants' production of documents, Bates Nos. D010085, 009442-9449.

14. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 13 are true and correct copies of Defendants' production of documents, Bates Nos. D002312-2313.

15. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 14 are true and correct copies of Defendants' production of documents, Bates Nos. D010587-10590, 2218-2221.

16. Attached to Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment as EXHIBIT 15 are true and correct copies of Defendants' production of documents, Bates Nos. D002314-2317, 2277-2278.

17. Attached to Memorandum of Law in Support of Plaintiffs Motion for Summary Judgment as EXHIBIT 16 is a true and correct copy of the Sample 12 N.Y.C.R.R. § 146-2.2 Tip Credit Notice.

18. Attached to Memorandum of Law in Support of Plaintiffs Motion for Summary Judgment as EXHIBIT 17 is a true and correct copy of Defendants' production of documents, Bates No. D000172.

19. Attached to Memorandum of Law in Support of Plaintiffs Motion for Summary Judgment as EXHIBIT 18 is a true and correct copy of Plaintiffs' production of documents, Bates No. P348.

I affirm, under penalty of perjury, that the above and foregoing information is true and correct.

Dated: New York, New York  
July 28, 2014

/s/ C.K. Lee  
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